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To: Ronald Bergman/DC/USEPA/US@EPA, Group Ow-Docket@EPA
cc: asdwa@erols.com, Dale Froneberger/R4/USEPA/US@EPA, "Sowerby,
John R." <John.R.Sowerby@dep.state.fl.us>
Subject: Attention Docket ID No. OW-2003-0065; Comments on EPA Submetering
Policy Draft

Dear Sirs:

The State of Florida, Department of Environmental Protection Agency, Drinking Water Program has reviewed the above referenced 'submetering' revised policy and offers the following comments:

1. We are very pleased that the EPA is recognizing the importance of metering for the purpose of water conservation and equity in billing to reflect actual usage that this new policy promotes. Therefore we support and agree with the revised policy as written.
2. Specifically in response to the four questions asked within the FR we would answer:
 - i. No, the parent PWS need not have access to the submetered properties. This is due to our interpretation of water lines on such properties being considered plumbing and subject to the state plumbing code.
 - ii. No, we do not feel additional or unforeseen public health issues are raised by this policy.
 - iii. No, we believe that EPA should NOT maintain a limitation on this policy to residential properties only. The argument of health risk, jurisdiction, plumbing and selling hold true regardless of the nature of the service area; be it residential or commercial.
Many residential uses are businesses and hence commercial (such as apartments and condos or mobile home parks). States do not want to get into deciphering the service area character or its classification. We do not want to regulate a Mall for example, simply because it meters the restaurants, but maybe not the clothing store.
 - iv. NA

We thank you for this opportunity to comment and if you have any followup questions please contact me at my e-mail address above.

Van Hoofnagle, Administrator
Florida Drinking Water Program